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24 MAY 2019

Elizabeth Denham, CBE
UK Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF

Ref: 19/CJS/KY/50

23 May 2019

Dear Elizabeth

Age Appropriate Design Code

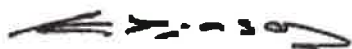
Further to your letter of the 14th of April and the launch of the above consultation the following day I write to place on record my response.

As you will be aware, as Northern Ireland Commissioner for Children and Young People (NICCY) I am mandated by 'The Commissioner for Children and Young People (Northern Ireland) Order' (2003) to safeguard and promote the rights and best interests of children and young people. NICCY has a statutory duty to advise on matters concerning the rights of children and young persons. In carrying out my functions, my paramount consideration is the rights of the child or young person and I am required to be cognisant of all relevant provisions of the United Nations Convention on the Rights of the Child (UNCRC).

In view of the above it was a pleasure to read your consultation document and the 16 standards that you propose and therefore have no suggestions for any changes. Children have a right to be protected, to be given access to (provision) and to participate in the online world which has is a crucial aspect of their lives. The proposed Code demonstrates a practical application of children's rights in the digital and data worlds in a way some have argued would not be possible. I welcome the careful consideration that your office has given to the application of children's rights standards and how they have been included within all aspects of the Code. The Age Appropriate Code provides clear instruction to those who provide online products or services in meeting their obligations to GDPR as mandated by the Data Protection Act, 2018.

I understand that your office engaged directly with children and young people in the development of the Code and I am sure that you have given further consideration in the measures that you will be taking to ensure that children and young people will be made aware of the Code once it has been agreed. This will include child accessible versions as well as an awareness raising campaign. Naturally if my office can assist you in any way please do not hesitate to let us know.

Yours sincerely



Koulla Yiasouma
Commissioner